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*Lead Counsel for Lead Plaintiff Daniel Warren & the Proposed Class*

*[Counsel for Defendants listed on signature page]*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

BHAPINDERPAL S. BHANGAL, Individually  
and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

HAWAIIAN ELECTRIC INDUSTRIES, INC.,  
CONSTANCE H. LAU, SCOTT W. H. SEU,  
GREGORY C. HAZELTON, and PAUL K. ITO,

Defendants.

Case No.: 3:23-cv-04332-JSC

**CLASS ACTION**

**JOINT NOTICE OF PENDING  
SETTLEMENT, MOTION FOR STAY AND  
[PROPOSED] ORDER**

Hon. Jacqueline Scott Corley

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION FOR STAY**

PLEASE TAKE NOTICE that on November 5, 2025, the Parties signed a binding term sheet to resolve all claims in this action following their mediation efforts. Pursuant to the parties' term sheet, they have agreed to endeavor in good faith to draft, finalize, and execute a definitive stipulation of settlement ("Stipulation of Settlement") within forty-five calendar days of the term sheet's execution, and that Plaintiffs shall file a motion for preliminary approval of the Stipulation of Settlement within five calendar days thereafter. Pursuant to those terms, Plaintiffs anticipate filing a motion for preliminary approval of the anticipated Stipulation of Settlement by December 26, 2025.

To facilitate such efforts and in the interests of conserving party and judicial resources, the Parties respectfully request that the Court stay all deadlines, discovery, pretrial and trial dates in this matter, except for those relating to the settlement of this action.

1 Respectfully submitted,

2 DATED: November 7, 2025

**POMERANTZ LLP**

3 /s/ Austin P. Van

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12 *Lead Counsel for Lead Plaintiff Daniel Warren &*  
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14 DATED: November 7, 2025

**SKADDEN ARPS SLATE MEAGHER &  
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28 *Counsel for Defendants Hawaiian Electric*  
*Industries, Inc., Constance H. Lau, Scott W. H.*  
*Seu, Gregory C. Hazelton and Paul K. Ito*

1  
2 DATED: November 7, 2025

**ALLEN OVERY SHEARMAN STERLING US  
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3 /s/ Daniel H.R. Laguardia

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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I am the ECF User whose identification and password are being used to file the foregoing Joint Notice of Pending Settlement, Motion for Stay and [Proposed] Order. Pursuant to Civil Local Rule 5-1(i)(3). I hereby attest that the other signatories have concurred in this filing.

Dated: November 7, 2025

/s/ Austin P. Van

Austin P. Van

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, **IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

\_\_\_\_\_  
HONORABLE JACQUELINE SCOTT CORLEY  
UNITED STATES DISTRICT COURT JUDGE